

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

KIMBERLEE WILLIAMS, ET AL.,

Plaintiffs,

V.

BASF CATALYSTS LLC, ET AL.,

Defendants.

No. 2:11-cv-01754 (JLL) (JAD)

CIVIL ACTION

**[PROPOSED] CONSENT ORDER
REGARDING PLAINTIFFS'
AMENDED RESPONSES TO BASF'S
FIRST SET OF INTERROGATORIES**

THIS MATTER having been opened by BASF's December 15, 2017 Letter-Motion to Compel Plaintiffs to Provide Further Responses to BASF's Interrogatories;

AND, the Court having ruled on plaintiffs' objections concerning the scope of discovery, plaintiffs' claims of privilege, and other issues;

AND, plaintiffs having agreed to amend their December 23, 2016 responses to BASF's first set of interrogatories;

AND, plaintiffs and BASF having agreed to the terms of this Order;

AND, for good cause appearing;

IT IS, this _____ day of December, 2017, hereby:

1. ORDERED that no later than December 29, 2017, plaintiffs shall serve amended responses to BASF's October 23, 2015 first set of interrogatories. Plaintiffs' amended responses shall withdraw objections that have been overruled by the Court, including but not limited to objections based on the attorney-client privilege or work product doctrine. Each plaintiff's amended responses shall include information necessary to provide a complete response to each

interrogatory; and it is hereby

2. FURTHER ORDERED that plaintiffs and BASF, by consent, may extend the deadline for plaintiffs to serve amended responses to BASF's October 23, 2015 first set of interrogatories; and it is hereby

3. FURTHER ORDERED that the Court's ruling concerning BASF's motion to compel based on plaintiffs' responses to BASF's November 7, 2017 second set of interrogatories shall be set forth in a separate order.

Dated: _____

_____,
Hon. Roberto A. Rivera-Soto
Special Master